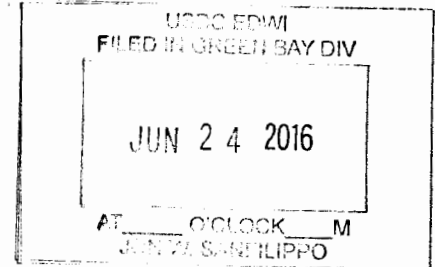


UNITED STATES DISTRICT COURT
EASTER DISTRICT OF WISCONSIN

Case No 16 CV 808



Plaintiff: Michael Sommerfield
725 W Pierce St
Lake Alfred, FL 33850

v.

Defendant: CITIGROUP GLOBAL MARKETS INC (CRD# 7059)
CITIBANK, 539 N. MICHIGAN, CHICAGO, IL 60611

I, Michael Sommerfield, Plaintiff, file suit to and make claim to recover \$3,600,000 theft of my 8% inheritance share from the Thelma Albert Irrevocable Trust by fraudulent actions of CITIGROUP GLOBAL MARKETS INC by their employee broker Brad Goldberg and the use of the Citibank Beverly Albert Sommerfield Brokerage Account. Plaintiff asks the Federal Court to award an additional penalty \$50,000,000 for undue emotional pain and mental anguish over CITIGROUP'S lack of DUE DILIGENCE, and their shameless participation of covert actions with other agencies and business professionals in the theft of the my inheritance of Trust.

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CAUSE OF ACTION

CITIGROUP took in the stolen funds from the Thelma Albert Irrevocable Trust through large withdrawals deposited too the Beverly Albert Sommerfield Brokerage Account over an 8 year period from the Thelma Albert Investment Account with the last deposit made from the Investment account to CITIGROUP in 2013. CITIGROUP knowing took the stolen funds from the Thelma Albert Investment Account that was controlled by Associated Trust CO of Green Bay,

WI. *Note please add to the cause of action - The 1968 Thelma Albert Irrevocable Trust was hidden from me, discovered July 17th, 2015. Associated Trust CO's breach of the 1968 Trust and the CF and IF Albert Trust was 1 is part of the theft of Citigroup*
Associated Trust CO set up the Thelma Albert Investment Account to control the theft of the Thelma Albert Irrevocable Trust. Associated Trust Co took a large 1986 fraudulent transfer that drained 90% (\$5,950,000) from the 1968 Thelma Albert Irrevocable Trust into the Thelma Albert Investment Account.

(Minimum balance estimate of the Thelma Albert Irrevocable Trust from the 1981 value of \$5,000,000)(With a June 1979 estimate of a possible \$30,000,000 balance of the Thelma Albert Irrevocable Trust at the death of Clarence Albert)

Associated Trust CO also used the Thelma Albert Investment Account to control Thelma Albert's estate through fraudulent Wills and 1993 Revocable Trust. Associated Trust Co in 1993 sent their corporate lawyer, of Green Bay, WI Attorney David Timm to draw up a March 1st, 1993 Thelma Albert Will and March 1st, 1993 "Revocable Trust" for Thelma Albert while she was in the I.C.U unit at Belen Hospital. The 1993 Will and Trust of Thelma Albert were used by

Beverly Sommerfield and Associated Trust CO to steal my inheritance from the 1968 irrevocable trust of Thelma Albert. Associated Trust changed the dynamics of my inheritance and my grandmother Thelma Albert by their fraudulent action and breach by the way Associated Trust CO used the 1993 Will and Revocable Trust. CITICORP knew the funds from the Thelma Albert Investment Account were from actions of theft from the 1968 Thelma Albert Irrevocable Trust. CITIGROUP used the 1993 Will and Revocable Trust the same way that Associated Trust Co did which was take control of the stolen funds from the Thelma Albert Irrevocable Trust.

I am a citizen of Florida, my grandmothers Wills and Trusts were of Brown County, WI. Associated Trust, David Timm and Beverly Sommerfield are of Brown County WI. State law of Wisconsin dictates jurisdiction is where the trusts and wills are executed. I cannot use Wisconsin State Court due to extreme corruption and control of the state court with conflict of interest and their Judges by Associated Trust/ Bank and their lawyers. I cannot use Wisconsin State Courts due to a violation of my Constitutional rights by Brown County Judge Atkinson baring me from the Court house files and filing my case information in person. I cannot use Wisconsin State Courts because of theft of my grandfather's case file 79PR53471T. Due to the corruption I want my Case heard in the Eastern District of the Federal Court of Wisconsin. I ask the Federal Court to provide a Judge to

this case that does not have a conflict of interest with Associated Bank or Trust Co and their lawyers. Due to the volume and size of Associated Bank and Trust a Federal Judge that is appointed to the Eastern District must have no conflict with Associated Trust and Bank and their lawyers. A new appointment by the Federal Government is then needed in to hear this Case in Brown County, WI.

Plaintiff
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